

COMPLAINT

(for filers who are prisoners without lawyers)

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2017 MAR 15 P 3:09

JON W. SANFILIPPO
CLERK

(Full name of plaintiff(s))

CASEY V. LAMB

v.

Case Number:

17-C-0383

(Full name of defendant(s))

(to be supplied by Clerk of Court)

CHRISTOPHER SCHMAILING (RACINE Co. SHERIFF)

ADVANCED CORRECTIONAL HEALTH CARE (RACINE Co. Jail Contracted H.C.P.)

LATISHA R.

(Medical Services Supervisor) (Employed by A.C.)

JANE DOE NURSE #1

(Employed By ADVANCED CORRECTIONAL H.C.)

JANE DOE NURSE #2

(Employed BY ADVANCED CORRECTIONAL H.C.)

A. PARTIES

1. Plaintiff is a citizen of ILLINOIS, and is located at

RACINE COUNTY JAIL, 717 WISCONSIN AVE., FLR. 2B
CELL # 3L, RACINE WISCONSIN, 53403

(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant CHRISTOPHER SCHMAILING (RACINE Co. SHERIFF)

ADVANCED CORRECTIONAL HEALTHCARE (RACINE Co. Jail, H.C. provider) (Name)

LATISHA R. (Medical Services Supervisor)

JANE DOE NURSE Complaint - 1 #1 (Employed By ADVANCED CORR. H.C.)

JANE DOE NURSE #2 (Employed By ADVANCED CORR. H.C.)

is (if a person or private corporation) a citizen of ILLINOIS (Advanced Correctional H.C.)
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for RACINE COUNTY SHERIFF'S DEPT./JAIL - Advanced Correctional Health Care
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

I WAS TRANSFERRED TO THE RACINE CO. JAIL FROM THE
ILLINOIS DEPT. OF CORRECTIONS (ON A INTERSTATE AGREEMENT ON
DETAINEES "I.A.D.") TO HAVE A FINAL DISPOSITION ON PENDING
FELONY CRIMINAL CHARGES IN THE STATE OF WISCONSIN ON
FEBRUARY 16, 2017. UPON ARRIVAL AT THE RACINE CO. JAIL A
UNKNOWN DEPUTY INVENTORIED MY PROPERTY, AND THEN PRICEEDED
TO ASK ME A SERIES OF MEDICAL QUESTIONS, ALTHOUGH I FELT MY
MEDICAL PRIVACY RIGHTS/HIPPA LAWS WERE BEING VIOLATED I
COMPLIED AND ANSWERED ALL QUESTIONS TO THE BEST OF MY ABILITY.
I INFORMED THE DEPUTY OF ONGGING BACK, KNEE, ARM, AND

Severe Dental Medical issues THAT I HAD AND Needed prompt
Attention, AS WELL AS Allergies THAT I HAVE. I Emphasised
THAT I Needed TO SEE TRAINED Medical personell Immediately,
AND WAS Told BY THE Deputy THAT A "Nurse would see me
Within 72 hours" AND Address All of My Medical and Dental Needs
AT THAT TIME FREE OF CHARGE, NO ONE EVER SAW ME. I Later Learned that
I MUST pay TO get A "Medical Screening" and Further pay TO
get any medications I needed and to see a dentist. I Also
Wrote the Medical director Here and grieved this policy, But ultimately
my Grievances were denied. ON OR ABOUT FEB. 26, 2017, I wrote THE Medical Supervisor
(LATISHA R.) and informed Her that I had Been experiencing extreme pain due to
dental issues (2 CRACKED TEETH w/ nerves exposed) and infection was setting in.
I Had recently learned that the Racine Co. Jail does not employ a dentist
and if "deemed important" (After you pay again) A Appointment may be made with
a outside dentist, But in the interim you just have to deal with whatever
dental issues you have. I paid for TWO "medical Screening", Finally received
a "soft diet" for 7 days, t1lerial for 3 days, and Oragel for 7 days, thats all.
I Was told that The "Waiting list" to see a dentist is extremely long and I
"Might see a dentist By April OR May". (Please see all enclosed supporting
documentation). I have Been forced to endure (I am still enduring) extreme pain (Dental)
due to the Combination of inadequate Medical/Dental screening procedures,
and Lack of Available professional Dental Services By THE defendants. I
Have put THEM on Actual notice of my Medical/Dental needs and of
my extreme tortuous pain, But they Are indifferent to my Serious
Medical/Dental needs. I Believe my 8th Amendment Right(s) Have
Been violated (amongst others) and wish to remedy this As soon as possible.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I WISH THE COURT TO ORDER Declaratory, Injunctive, AND
MONEY RELIEF IF I WIN JUDGMENT AGAINST THE
DEFENDANTS, AS WELL AS WHATEVER THE COURT DEEMS
JUST, PROPER, AND EQUITABLE, INCLUDING A TRO,
AND A COURT ORDER TO FORCE DEFENDANTS TO PROVIDE
EMERGENCY DENTAL CARE IN A REASONABLY TIMELY MANNER,
A COURT MONITOR TO OVERSEE INSTITUTION AND IMPLEMENTATION
OF Jail policy/medical/dental care practice AND
PROCEDURAL CHANGES. MONETARY AWARD IN THE AMOUNT OF
\$1,000,000.00 AND I WANT TO SUE ALL DEFENDANTS IN THEIR
OFFICIAL AND PERSONAL CAPACITIES.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this _____ day of _____ 20 17.

Respectfully Submitted,

Signature of Plaintiff

SPN# 115016

Plaintiff's Prisoner ID Number

CASEY V. LAMB, SPN# 115016, RACINE Co. Jail, 2B, 717

WISCONSIN AVE., RACINE WI. 53403

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE



I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.



I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.